Joseph J. Tabacco, Jr. (75484)
Email: jtabacco@bermanesq.com
Nicole Lavallee (165755)
Email: nlavallee@bermanesq.com
Julie J. Bai (227047)
Email: Jbai@bermanesq.com
BERMAN DeVALERIO PEASE TABACCO BURT & PUCILLO
425 California Street, 21st Floor
San Francisco, CA 94104
Telephone: (415) 433-3200
Facsimile: (415) 433-6382

Attorneys for Proposed Lead Plaintiff Louisiana Municipal Police Employees' Retirement System

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

HCL PARTNERS LIMITED PARTNERSHIP, on behalf of itself and all others similarly situated, Plaintiff, v. LEAP WIRELESS INTERNATIONAL, INC., S. DOUGLAS HUTCHESON, DEAN M. LUVISA, AMIN I. KHALIFA and PRICEWATERHOUSECOOPERS, LLP, Defendants.	No. 07-CV-02245-BTM-NLS CLASS ACTION **NOTICE OF MOTION AND MOTION OF LOUISIANA MUNICIPAL POLICE EMPLOYEES' RETIREMENT SYSTEM TO CONSOLIDATE RELATED ACTIONS, FOR APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL** DATE: March 28, 2008 TIME: 11:00 a.m. CTRM: Courtroom 15 (5th Fl.) PER CHAMBERS, NO ORAL ARGUMENT UNLESS REQUESTED BY COURT.

CAPTION CONTINUES ON NEXT PAGE

FRANK CHAREK, Individually and on behalf of all others similarly situated, Plaintiff, v. LEAP WIRELESS INTERNATIONAL, INC., S. DOUGLAS HUTCHESON, MARK H. RACHESKY, AMIN I. KHALIFA, GLENN UMETSU and DEAN M. LUVISA, Defendants.	No. 07-CV-2256-BTM-NLS CLASS ACTION
DEVAY CAMPBELL, Individually and on behalf of all others similarly situated, Plaintiff, v. LEAP WIRELESS INTERNATIONAL, INC., S. DOUGLAS HUTCHESON, MARK H. RACHESKY, AMIN I. KHALIFA, GLENN UMETSU and DEAN M. LUVISA, Defendants.	No. 07-CV-2297-BTM-NLS CLASS ACTION
KENT CARMICHAEL, Individually and on behalf of all others similarly situated, Plaintiff, v. LEAP WIRELESS INTERNATIONAL, INC., S. DOUGLAS HUTCHESON, MARK H. RACHESKY, AMIN I. KHALIFA, and DEAN M. LUVISA, Defendants.	No. 08-CV-0128-BTM CLASS ACTION

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on March 28, 2008, at 11:00 a.m., or as soon thereafter as this matter may be heard in the courtroom of the Honorable Barry Ted Moskowitz, located at Courtroom 15, 5th Floor, 940 Front Street, San Diego, California, 92101-8900, Louisiana Municipal Police Employees' Retirement System ("MPERS") will move this Court pursuant to

Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. § 78u-4(a)(3)(B), for an Order:

(a) consolidating all related actions;

(b) appointing MPERS as Lead Plaintiff for a class (the "Class") of investors in the publicly traded securities of Leap Wireless International, Inc.("Leap" or the "Company"); and

(c) approving Berman DeValerio Pease Tabacco Burt & Pucillo ("Berman DeValerio") as Lead Counsel for the Class.

This motion is made on the grounds that MPERS, an institutional investor, is the most adequate plaintiff, as defined by the PSLRA, based on its losses of approximately $132,375.00 which were suffered as a result of defendants' wrongful conduct as alleged in the above referenced actions and as discussed in the accompanying Memorandum of Points and Authorities in Support of the Motion of MPERS to Consolidate Related Actions, For Appointment as Lead Plaintiff and for Approval of its Selection of Lead Counsel ("Memorandum of P&A"). Further, MPERS satisfies the requirements of Rule 23(a) of the Federal Rules of Civil Procedure, as its claims are typical of those of the other members of the proposed Class, and it will fairly and adequately represent the Class. In addition, MPERS has selected and retained counsel with extensive experience in successfully prosecuting securities fraud class actions to serve as Lead Counsel for the Class.

This motion is also made on the grounds that consolidation is proper since the actions involve common questions of law and fact.

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This motion is based upon this Notice, the attached Memorandum of P&A, the Declaration of Nicole Lavallee, the Certification of R. Randall Roche, the pleadings and other files herein and such other written and oral arguments as may be presented to the Court.

Dated: January 28, 2008

BERMAN DeVALERIO PEASE TABACCO BURT & PUCILLO

By: /s/ Nicole Lavallee
NICOLE LAVALLEE

Joseph J. Tabacco, Jr.
Julie B. Bai
425 California Street,
Suite 2100
San Francisco, CA 94104-2205
Telephone: 415-433-3200

Attorneys for Proposed Lead Plaintiff Louisiana Municipal Police Employees' Retirement System